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July 18, 1997

**VIA HAND DELIVERY**


Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

**Re: MM Docket No. 87-268**

Dear Mr. Caton

Transmitted herewith, on behalf of South Dakota Board of Directors for Educational Telecommunications, licensee of noncommercial educational station KPSD-TV are an original and four copies of its Opposition to Petition for Partial Reconsideration of Sixth Report and Order (DBE).

Very truly yours



Stanley S. Neustadt

Enclosures

DS1/38427-1



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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

BEFORE THE

# Federal Communications Commission

In the Matter of

Advanced Television Systems  
and Their Impact upon the  
Existing Television Broadcast  
Service

MM Docket No. 87-268

TO: The Commission

**OPPOSITION OF SOUTH DAKOTA ETV TO DUHAMEL  
PETITION FOR PARTIAL RECONSIDERATION OF  
SIXTH REPORT AND ORDER**

The South Dakota Board of Directors for Educational Telecommunications ("SDETV"), which is the licensee of noncommercial educational television station KPSD-TV, Eagle Butte, SD, among others, by its attorneys, pursuant to Section 1.429 of the Commission's Rules, files this Opposition to the Petition for Partial Reconsideration filed in the above-captioned proceeding by Duhamel Broadcasting Enterprises ("DBE") insofar as it seeks a change in the DTV allotment for its Station KHSD-TV in Lead, South Dakota. In support of this opposition, SDETV states:

1. DBE is the licensee of four VHF TV stations, in Rapid City, South Dakota, Scottsbluff, Nebraska, Sheridan, Wyoming, and Lead, South Dakota. DBE asks that the Commission allot VHF, rather than UHF, channels for three of these stations in order to "preserve our market size". One of the proposed changes -- to revise the DTV allotment for KHSD-TV in

Lead, South Dakota from channel 27 to channel 12, would adversely affect the existing NTSC service of adjacent channel 13, in Eagle Butte, SDETV's Station KPSD-TV. Therefore, SDETV opposes this change.

2. Although the proposed change of the DTV allotment for KHSD-TV from channel 27 to channel 12 technically meets the minimum separation of 80 km for adjacent channel stations vis-a-vis SDETV's Eagle Butte Station KPSD-TV, Channel 13 (see data attached to the Petition for Partial Reconsideration), SDETV's experience has shown that both these stations have greatly extended ranges of service due to their locations and the propagation characteristics associated with VHF transmission. DBE's KHSD-TV tower is located on a 7000 foot mountain; SDETV's KPSD-TV tower is over 1600 feet tall. This extraordinary situation is dramatized in the profile graph for Stations KHSD-TV and KPSD-TV attached to the KHSD-TV portion of the engineering attachment to DBE's Petition -- there is virtually no terrain between the two stations for approximately 1000 meters below their lines of sight.

3. In practice, if not in theory, this combination of adjacent channels would result in interference in the overlapping coverage areas. This problem would not be limited to the DTV-NTSC transition period, because SDETV intends, at the end of that period, to broadcast a DTV signal on Channel 13 in Eagle Butte, rather than remain on Channel 24 which is KPSD-TV's DTV allotted channel. As a public broadcasting station, cost is a major factor, so that SDETV's use of the UHF channel after the transition is not economically feasible.

For the foregoing reasons, the DBE Petition for Partial Reconsideration, insofar as it requests the allotment of Channel 12 to Station KHSD-TV in Lead, South Dakota, should be Partially Denied.

Respectfully submitted

SOUTH DAKOTA BOARD OF DIRECTORS FOR  
EDUCATIONAL TELECOMMUNICATIONS

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Stanley S. Neustadt

By: Roy R. Russo  
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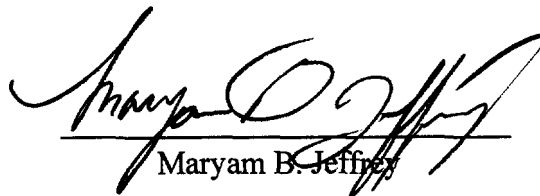
July 18, 1997

Its Attorneys

## **CERTIFICATE OF SERVICE**

I, Maryam B. Jeffrey, do hereby certify that a true and correct copies of the foregoing OPPOSITION OF SOUTH DAKOTA ETV TO DUHAMEL PETITION FOR PARTIAL RECONSIDERATION OF SIXTH REPORT AND ORDER were mailed, first-class postage prepaid, this 18th day of July 1997 to the following:

William F. Duhamel  
President  
Duhamel Broadcasting Enterprises  
P.O. Box 1760  
Rapid City, South Dakota 57709



Maryam B. Jeffrey